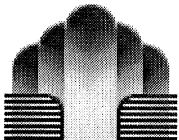


201-14426



Peter Wendolkowski

04/30/2003 03: 11 PM

To: Peter Wendolkowski/DC/USEPA/US@EPA

cc:

cc:

Subject: Environmental Defense comments on the proposed
N,N-Dimethylalkanamides category



Richard_Denison@environmentaldefense.org on 04/29/2003 03:59:40 PM

To: oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA,
Karen Boswell/DC/USEPA/US@EPA, gwentwor@cphall.com

cc: MTC@mchsi.com, LUCIERG@msn.com, kflorini@environmentaldefense.org,
rdenison@environmentaldefense.org

Subject: Environmental Defense comments on the proposed N,N-Dimethylalkanamides category

(Submitted via Internet 4/29/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov,
boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and
gwentwor@cphall.com)

Environmental Defense appreciates this opportunity to submit comments on
the Robust Summary/Test Plan for the proposed N,N-Dimethylalkanamides
category.

Under the High Production Volume Challenge, the C.P. Hall Company has
submitted a Test Plan/Robust Summary for two chemicals --
N,N-dimethyloctanamide (CAS # 1118-92-g) and N,N-dimethyldecanamide (CAS #
14433-76-2) -- with the proposal that they be considered together as a
category. N,N-dimethyldecanamide is available commercially as Hallcomid
M-10, whereas N,N-dimethyloctanamide is available only as part of a mixture
of similar compounds marketed as Hallcomid M-8-10. Hallcomid M-8-10
contains approximately 50-65% N,N-dimethyloctanamide, with
N,N-dimethyldecanamide as the secondary component and
N,N-dimethylhexanamide and N,N-dimethyldodecanamide as minor
components/impurities. According to the sponsor, these chemicals are used
primarily as inert ingredients in pesticides. Minor uses are not
mentioned.

On review of the Test Plan submitted for these compounds, we agree that
these chemicals have very similar chemical structures and properties and
should be considered together as a category. Our review also indicates the
Test Plan is carefully prepared and well-organized, and presents and
describes data addressing each of the requested SIDS elements for one or
both of these chemicals. Given the similarities in chemical structure and
properties, we feel it appropriate that data available for one of these
chemicals be used to estimate the respective SIDS elements for the other.
With exception of the chemical structures of these compounds, which were
not provided, each of the requested SIDS elements is addressed by adequate
data on one or both of these compounds. We also compliment the C.P. Hall
Company for providing a list of references in the Test Plan for the sources
of these data.

All available data indicate N,N-dimethyldecanamide and Hallcomid M-8-10 are
moderately toxic to aquatic organisms and of low toxicity to birds and
mammals. They are rapidly degraded in the environment and would not be
expected to accumulate. Whereas they are mild irritants to the eyes and
skin, they are not mutagenic and have no reproductive or developmental
toxicity at doses that are not also toxic to the mothers.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense